

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**M.A. HANNA PLASTICS GROUP, INC.,
WILMINGTON ECONOMIC
DEVELOPMENT CORPORATION
AND SIDNEY AND CAROL MAFFETT,**

Defendants.

CIVIL ACTION 06-409-GMS

STIPULATION FOR EXTENSION OF DISCOVERY DEADLINES

THIS STIPULATION made as of July ___, 2007 is entered into by and among M.A. HANNA PLASTICS GROUP, INC., (“Hanna”), WILMINGTON ECONOMIC DEVELOPMENT CORPORATION (“WEDCO”), UNITED STATES OF AMERICA (“USA”) and SIDNEY AND CAROL MAFFETT (collectively “Maffet”) (collectively Hanna, WEDCO, USA and Maffet are referred to as the “Parties”) to set forth the agreement of the Parties to the extension of the discovery deadlines set by this Honorable Court in the Minutes of the Scheduling Conference of November 22, 2006 and the Scheduling Deadline Order of December 5, 2006 (collectively the “Scheduling Order”) providing adequate time for the Parties to complete the currently anticipated discovery without the need for the changing the dates already set for the Pretrial Order and motions in limine to be submitted on February 11, 2008 or to delay the trial of this matter scheduled for April 7, 2008.

1. The Complaint in this matter was filed on June 26, 2006 and the filing of responsive pleadings was completed on September 7, 2006.

2. This Honorable Court held a scheduling conference on November 22, 2006 during which the Parties and the Court agreed to the establishment of deadlines for discovery, as well as, the date for filing of dispositive motions, motions in limine, the pretrial order, trial conference and trial.

3. This Honorable Court memorialized and ordered the various deadlines in the Scheduling Order.

4. Although the Parties have engaged in substantial discovery through interrogatories and document exchanges, the Parties have not yet completed certain addition document requests and the taking of the depositions desired by certain of the Parties and it is anticipated that those depositions will not be able to be completed by October 8, 2006 (the current deadline for fact discovery).

5. The anticipated inability of the Parties to complete the depositions by October 8, 2006 is not the product of delay or lack of diligence of any Party; but rather, are the result of scheduling conflicts and lack of accessibility of certain desired deponents.

6. Indeed, the Parties have scheduled discovery and the depositions potential witnesses to occur during the month of August as follows:

July 24, 2007 at 10:00 a.m.: Ten Bears document production,
subpoena return date

August 13, 2007 at 10:00 a.m.: Deposition of Sidney Maffett

August 15, 2007 at 10:00 a.m.: Deposition of Michael Towle

August 16, 2007 at 10:00 a.m.: Continue Deposition of Michael Towle

7. Particularly, Hanna desires to schedule during September or October the following depositions which have not yet been scheduled (and certain of which can not be scheduled due to witnesses not been designated yet or being unavailable during the month of September) as follows:

Ann Breslin (not available month of September)

Robert Asreem

Representative(s) of WEDCO

8. The Parties have agreed on the extension of the fact discovery deadline for a month from October 8, 2007 to November 9, 2007, the deadline to complete all expert depositions from January 4, 2008 to February 1, 2008, as well as certain deadline dates related thereto as set forth below:

ACTIVITY	CURRENT DATE	PROPOSED DATE
Fact discovery ends.	October 8, 2007	November 9, 2007
Expert reports are due.	October 8, 2007	November 9, 2007
Dispositive motions due, Local Rules apply (Opening brief filed with the motion, answering brief within ten business days, reply brief within five business days); Opening and Answering briefs no more than five pages without leave of court, reply no longer than three pages; if relief is requested, must explain why.	October 22, 2007	December 3, 2007
Responsive expert reports are due.	November 8, 2007	December 28, 2007
Depositions of experts to be completed.	January 4, 2008	February 1, 2008
Pretrial Order is due. Motions in limine to be submitted with the pretrial stipulation.	February 11, 2008	February 11, 2008

Pretrial conference at 10:00 a.m. (discuss whether jury or bench trial at pretrial conference.)	March 6, 2008	March 6, 2008
Two week trial starts today.	April 7, 2008	April 7, 2008

9. The agreed upon changes in the deadlines will not alter the deadlines for the submission of the Pretrial Order and motions in limine on February 11, 2008 or delay the trial of this matter scheduled for April 7, 2008.

THIS STIPULATION IS ENTERED INTO BY THE PARTIES HERETO,
SUBJECT TO THE APPROVAL OF THE COURT:

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The Stipulation is hereby approved this _____ day of July, 2007:

Honorable Gregory M. Sleet
United States District President